

COHEN & GREEN

September 26, 2022

Hon. John P. Cronan, U.S.D.J.
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007-1312

By Electronic Filing.

Re: Curran-Groome v. City of New York, 22-cv-00710

Dear Judge Cronan:

I am co-counsel for Plaintiff in the above-captioned matter. I write, jointly with Defendants, to ask for an extension of the time to submit a proposed case management plan and any accompanying requests. The current deadline is today (September 26, 2022), and this is the first request following the procedural adjournment because of the Plan Mediation. *See* Dkt. No. 37.

The reason for this request is that the parties have been discussing the issue of coordination of *Monell* discovery with the consolidated docket at 20-cv-8924 (*In re New York City Policing During Summer 2020 Demonstrations*), which covers substantively similar (if not ultimately identical) *Monell* claims to the ones at issue here. Defendants do not have a position yet, and have asked for more time to consider the orders of this Court and the Eastern District granting similar relief. Since the coordination would substantively alter the burden of discovery, the parties agree it makes sense to hammer out their positions first. We therefore ask that the Court allow the parties to submit the plan — and any related letters or motions — on or before Friday, September 30, 2022. The initial conference is scheduled for October 3, 2022, so this will not impact any other deadline. *See* Dkt. No. 37.

Thank you for your attention to this matter.

Respectfully submitted,

/s/

J. Remy Green

Honorific/Pronouns: Mx., they/their/them

COHEN&GREEN P.L.L.C.

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cc:

All relevant parties by ECF.